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THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER,

Plaintiff,

v.

JOSHUA MOON, *et al.*

Defendants.

**DEFENDANTS' NOTICE OF
SUPPLEMENTAL AUTHORITY
REGARDING MOTION TO
REVIEW IN FORMA PAUPERIS
STATUS**

Case No. 2:24-cv-00421-DBB

District Judge David Barlow
Magistrate Judge Jared C. Bennett

NOW COME the Defendants, by and through their undersigned counsel, and advise the Court that recently-discovered evidence further supports Defendants' Motion to Review Mr. Greer's *In Forma Pauperis* Status. ECF No. 253.

The attached CAD Report, obtained by Defendants on March 31, 2025, reveals that Mr. Greer represented to the Nye County, Nevada Sheriff's Department on November 22, 2024, that he had significant financial resources, which he appears not to have disclosed to this Court. Specifically, Mr. Greer told the Nye County Sheriff "I run an LLC in Nevada that wanted to purchase the Cherry Patch: the rustic building with the female statue in Crystal... I actually had written [the owner] directly and her representatives for a year, trying to convince her to sell." Exhibit A at 2. Mr. Greer thus appears to have told law enforcement that from at least 2023 to 2024, Plaintiff was

attempting, on behalf of an LLC that he “runs,” to purchase a substantial piece of real property, and a statue, in Nye County, Nevada. Public news reports indicate that the “Cherry Patch Ranch,” which is a former Nevada brothel described in Mr. Greer’s report to the Nye County, Nevada Sheriff, was listed for sale at \$1,200,000.00. Amy Walters and Laura Sharman, The Telegraph, *Infamous brothel on market for £900,000 with old mattresses and raunchy outfits*, <https://www.mirror.co.uk/news/us-news/infamous-brothel-market-900000-old-26525005> (March 22, 2022).

Although Mr. Greer’s request for *in forma pauperis* status remains under seal and Defendants have not been able to review it, Defendants assert upon information and belief that Mr. Greer did not reveal to this Court when he applied for *in forma pauperis* status, or at any point thereafter, that he has a controlling interest in a Nevada LLC with sufficient resources to make purchases of real estate and artwork valued at over a million dollars. Presumably, if Mr. Greer had revealed his financial wherewithal was sufficient to purchase a property listed for sale at over a million dollars, this Court would have denied his request for *in forma pauperis* status under DUCivR 3-2.

WHEREFORE, Defendants respectfully submit that this Court should review Mr. Greer’s current financial status and hold that Plaintiff is not entitled to proceed as a pauper.

DATED March 31, 2025

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

Attorney for Defendants Joshua Moon
and Lolcow, LLC